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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 STEPHEN BENJAMIN, on behalf of himself
15 And all similarly situated persons,

16 CASE NO. 2:11-cv-01840-KJD-GWF

17 Plaintiff,

18 vs.

19 GLOBAL CREDIT & COLLECTION
20 CORPORATION, a foreign corporation,
21 DOES I-V inclusive and ROE Corporations
22 VI-X, inclusive

23 Defendants.

24 **STIPULATED DISCOVERY PLAN AND
25 SCHEDULING ORDER**

26 **SPECIAL SCHEDULING REVIEW
27 REQUESTED**

28 COMES NOW Defendant GLOBAL CREDIT & COLLECTION CORPORATION, by and
through its counsel, GREGORY A. KRAEMER, ESQ., of COOPER LEVENSON APRIL
NIEDELMAN & WAGENHEIM P.A., and Class Plaintiffs by and through their counsel CRAIG B.
FRIEDBERG, ESQ., of THE LAW OFFICE OF CRAIG B. FRIEDBERG and hereby submit this
proposed discovery plan and scheduling order.

Class Plaintiff and the class of persons he seeks to represent, and Defendant, by and through
their respective counsels, hereby stipulate to the following Discovery Plan and Scheduling Order
("Discovery Plan"), pursuant to Local Rule 26-1 et seq.,

Defendant filed its answer on January 20, 2012. The parties held a FRCP 26(f) conference
on March 16, 2012, and will exchange their FRCP 26(a) initial disclosures on or before March 30,
2012.

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1 The parties have agreed to the various discovery and pre-trial time periods different from
2 those set forth in LR 26-1(e) for the following reasons:

3 The parties wish to add an additional 90 days to the standard six (6) month discovery period
4 to allow them to conduct informal discovery regarding class size, net worth and actual damages in
5 order to resolve the case on a class-wide basis without driving up attorney fees and costs. However,
6 should these efforts not be successful, the parties believe that the full time allowed pursuant to LR
7 26(e) will be needed to complete discovery. The parties agree to follow LR 26(e) for the other
8 prescribed scheduling deadlines from this extended discovery date.

9 A. **Discovery in the above-entitled action shall be completed on or before October**
10 **16, 2012** (270 days from the date defendant answered).

11 B. **Amending the Pleadings and Adding Parties** are required on or before **July 16,**
12 **2012** (not later than ninety (90) days prior to the close of discovery).

13 C. **Fed. R. Civ. P. 26(a)(2)(C) disclosures concerning experts** are required on or before
14 **August 17, 2012** (sixty (60) days before the discovery cut-off date) and **disclosures**
15 **respecting rebuttal experts** are required on or before **September 17, 2012** (thirty-one (31)
16 days after the initial disclosure of experts; 30th day falls on a Sunday).

17 D. The parties shall submit an **interim status report** on or before **August 17, 2012**
18 (sixty (60) days before the discovery cut-off date), stating the time they estimate will be
19 required for trial, giving three (3) alternative available trial dates, and stating whether, in the
20 opinion of counsel who will try the case, trial will be eliminated or its length affected by
21 substantive motions.

22 E. The date for filing **Dispositive Motions** shall not be later than
23 **November 15, 2012** (thirty (30) days after the discovery cut-off date).

24 F. Class plaintiffs shall have until **August 1, 2012** **within which to file their motion for**
25 **class certification.** Defendant shall have until **twenty-one (21) days from the date of**
26 **service of the motion within which to respond** to such motion. Class plaintiffs shall have
27 **twenty-one (21) days from the date of service of the response** to reply to said response.

28 G. The **joint pretrial order** shall be filed not later than **December 17, 2012** (thirty (32)

1 days after the date set for filing dispositive motions; the 30th day falls on a Saturday). In the
2 event dispositive and/or class certification motions are filed, the date for filing the joint
3 pretrial order shall be suspended until thirty (30) days after decision of the dispositive and/or
4 class certification motions or further order of the court. Unless the discovery plan otherwise
5 provides and the court so orders, the disclosures required by Fed. R. Civ. P. 26(a)(3) and any
6 objections thereto shall be included in the pretrial order.

7 H. Last date to move for extension of discovery under LR 26-4 (21 days before the
8 discovery deadline): **September 26, 2012.**

9 DATED this 23rd day of March, 2012.

10 LAW OFFICE OF
11 CRAIG B. FRIEDBERG

12 /s/ Craig B. Friedberg
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18 Attorneys for Defendant

19 IT IS SO ORDERED:

20 UNITED STATES MAGISTRATE JUDGE
21 DATED: _____